August 5, 2025

VIA ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Petersen Energía Inversora, S.A.U. v. Argentine Republic, No. 15-cv-02739; Eton Park Capital Management, L.P. v. Argentine Republic, No. 16-cv-8569

Dear Judge Preska:

The parties respectfully set forth below the discovery matters that one or both of them seek to raise at the upcoming conference. The parties disagree about whether this list satisfies the Court's direction at the July 29, 2025 Conference but have been unable to reach agreement on making a substantive submission.

- 1. Requests Regarding Certain Assets in Argentina (Joint Status Report, July 26, 2025 ("JSR") at 10-17);
- 2. "Off-Channel" or "Non-Government" ESI and Internal Communications for "Alter-Ego" Discovery, and "Alter-Ego" Discovery Regarding Additional Entities (JSR at 28-40; July 29, 2025 Hr'g Tr. at 52:4-8; 53:16-23; 63:17-18; 65:9; 66:2-3);
- 3. Document Preservation;
- 4. Information Subpoena Question 31 (JSR at 25-28);
- 5. Privatizations (JSR at 22-25);

- 6. SWIFT Messages (JSR at 18-20);
- 7. Identification of Accounts (JSR at 20-22);
- 8. Movable Assets (JSR at 9-10);
- 9. Previous Searches;
- 10. Motions to Seal;
- 11. Plaintiffs' Request to Schedule Regular Status Conferences; and
- 12. Metadata.

Respectfully Submitted,

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